

District Court Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
 WESTERN DISTRICT OF WASHINGTON **SG** JUL - 8 2021  
 AT SEATTLE

FILED ENTERED  
 LODGED RECEIVED

UNITED STATES OF AMERICA

NO. CR 19-117-JLR

AT SEATTLE  
 CLERK U.S. DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON  
 DEPUTY

v.

GOVERNMENT'S MOTION TO  
SEAL

SHAWNA REID,

Defendant.

The United States of America, by and through its counsel of record, Nicholas L. McQuaid, Acting Assistant Attorney General, United States Department of Justice, Matthew K. Hoff, Trial Attorney, and Christina Taylor, Trial Attorney, hereby moves this Court for an order permitting the government to file under seal (a) an *ex parte* notice of filing under seal; and (b) a compact disc containing an audio recording of the Defendant Shawna Reid's Grand Jury testimony of February 28, 2018 ("CD"). Sealing is permissible and appropriate for the *ex parte* notice and CD, which are being lodged concurrently with this motion to seal, because they discuss grand jury matters pursuant to Federal Rule of Criminal Procedure 6(e).

If this Court denies this motion to seal and determines that the government's *ex parte* notice and the CD should not be filed under seal, the government respectfully requests that the Court return those documents and materials to government counsel without filing them publicly.

Motion to Seal  
*United States v. Reid*, No. CR19-117JLR

ASSISTANT ATTORNEY GENERAL  
 1301 NEW YORK AVENUE, NW  
 SUITE 700  
 WASHINGTON, D.C. 20005  
 (202) 514-3594

1 The government further requests that the *ex parte* notice and CD remain under seal  
2 unless the Court orders unsealing at a later date.

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4 DATED this 8<sup>th</sup> day of July 2021.

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6 Respectfully submitted,

7 Nicholas L. McQuaid  
8 Acting Assistant Attorney General

9 s/Matthew K. Hoff  
10 MATTHEW K. HOFF  
11 Trial Attorney

12 s/Christina Taylor  
13 CHRISTINA TAYLOR  
14 Trial Attorney

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28 Motion to Seal  
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